

**REQUIRED STATEMENT  
TO ACCOMPANY ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Tharon Bradley Case No. 18-16173 Chapter 13  
All Cases: Name of Moving Creditor Ally Financial Date Case Filed June 6, 2018

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed August 28, 2018

Chapter 7: ☐ No-Asset Report Filed on \_\_\_\_\_  
☐ No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral  
a. ☐ Home \_\_\_\_\_  
b. ☒ Car Year, Make and Model 2012 CADILLAC ESCALADE VIN:1GYS4DEF2CR181243  
c. ☐ Other \_\_\_\_\_

2. Balance Owed as of Petition Date \$ 32,412.46  
Total of all other Liens against Collateral \$ \_\_\_\_\_

3. Attach a payment history, or list the months post-petition for which full payment from the debtor was not  
Received: July 2018 through January 2019

4. Estimated Value of Collateral (must be supplied in all cases) \$28,075.00

5. Default  
a. ☐ Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_  
b. ☒ Post-Petition Default  
☒ On direct payments to the moving creditor  
Number of months July 2018 through January 2019 Amount \$ 6,914.35, which amount  
includes attorney fees and costs of \$681.00  
☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations  
a. ☒ Lack of Adequate Protection § 362 (d)(1)  
i. ☒ No insurance \_\_\_\_\_  
ii. ☐ Taxes unpaid \_\_\_\_\_ Amount \$ \_\_\_\_\_  
iii. ☒ Rapidly depreciating asset \_\_\_\_\_  
iv. ☐ Other (describe) \_\_\_\_\_  
b. ☒ No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)  
c. Other "Cause" § 362 (d)(1)  
i. ☐ Bad Faith \_\_\_\_\_  
ii. ☐ Multiple filings \_\_\_\_\_  
iii. ☐ Other (describe) \_\_\_\_\_  
d. Debtor's Statement of Intention regarding the Collateral  
i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: February 5, 2019  
(Rev. 6/1/09)

/s/ James M. Philbrick  
Counsel for Ally Financial